

September 20, 2013

**VIA ELECTRONIC MAIL**

The Honorable Denise L. Cote  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1610  
New York, NY 10007-1312

Re: FHFA Actions, 11 Civ. 6192 (DLC), et al.

Dear Judge Cote:

We write on behalf of Plaintiff Federal Housing Finance Agency (“FHFA”), and with the consent of the defendants in the above-captioned actions, to jointly request a brief extension, until Tuesday, September 24, 2013, to allow the parties to further meet and confer on an expert schedule and summary judgment schedule in the Tranche 3 and 4 actions. The parties anticipate providing the Court with a joint stipulated proposal for a number of the cases that comports with the Court’s prior guidance and will advise the Court of any remaining disagreements by no later than September 24, 2013.

Furthermore, at the August 14, 2013 status conference, the Court recommended that the parties adopt a protocol for exchanging expert topics for which the parties intend serving expert reports, and to submit a proposed order to the Court or inform the Court of any disagreement among the parties by no later than September 20, 2013. Aug. 14, 2013 Hr’g Tr. at 25:3-7. While FHFA has reached agreement with certain tranches on an expert disclosure protocol, FHFA respectfully requests a short extension to continue to meet and confer with other defendants in hopes of reaching global agreement. The parties intend to submit a joint proposal to the Court, or inform the Court of any disagreement concerning the protocol, on September 24, 2013.

The Honorable Denise L. Cote

September 20, 2013

Respectfully submitted,

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cc: All Counsel of Record